

# GLENN AGRE BERGMAN & FUENTES

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June 20, 2023

By Electronic Filing

Honorable Rukhsanah L. Singh, U.S.M.J.  
United States District Court for the District of New Jersey  
402 East State Street  
Court Room 7W  
Trenton, NJ 08608

Dear Judge Singh:

This firm represents Plaintiff John Doe in the above-captioned matter. We write on behalf of the parties in response to Your Honor's June 6, 2023 Order requiring the parties to "file a proposed amended scheduling order by no later than 6/20/2023." The parties have agreed to a proposed sixty-five day extension of time to complete fact discovery and to extend all subsequent discovery deadlines accordingly.

The current fact discovery deadline is June 27, 2023, with Plaintiff's expert reports due on July 31, 2023; Defendant's expert reports due on August 28, 2023; and the deadline for all expert discovery set to September 29, 2023.

The sixty-five day extension is needed to enable the parties to complete document disclosure and fact witness depositions – which have not yet commenced. Princeton was unable to search, review, and produce Doe's Princeton.edu emails until Doe confirmed which emails he was asserting privilege over on June 2. Princeton does not dispute any of Doe's privilege claims at this time. Further, Your Honor's recent June 6, 2023 discovery order necessitated further document collection, review, and production from Doe for which Doe needs additional time.

If granted, the proposed extension would change the fact discovery deadline to August 31, 2023; the due date for Plaintiff's expert reports to October 4, 2023, the due date for Defendant's expert reports to November 1, 2023; and the deadline for all expert discovery to December 4, 2023. We have enclosed a proposed amended scheduling order.

Thank you for your consideration.

Respectfully yours,

*/s/ Jewel K. Tewiah*

CC: All Counsel of Record